

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DWAYNE HASKINS, SR., TAMARA	:	
HASKINS, TAMIA HASKINS, AND	:	
HASKINS FAMILY FOUNDATION INC.,	:	
	:	
Plaintiffs,	:	Case No.: 2:24-cv-01085-WSS
	:	
v.	:	Electronically Filed
	:	
KALABRYA HASKINS,	:	
	:	
Defendant.	:	
	:	

PLAINTIFFS’ SHOW CAUSE RESPONSE

The Plaintiffs, Dwayne Haskins, Sr., Tamara Haskins, Tamia Haskins, and The Haskins Family Foundation Inc. (hereinafter, the “Plaintiffs”), through their undersigned counsel of record, file this Show Cause Response in compliance with the Court’s October 10, 2024 Order to Show Cause. Specifically, the Court directed that “Plaintiffs show cause whether sealed and redacted portions of their complaint should be unsealed.”

Plaintiffs are prepared to move forward with their substantive case in which they seek a Declaratory Judgment that Defendant Kalabrya Haskins is legally prohibited from challenging, *in any manner*, Plaintiffs’ Project, as the Project falls under the “fair use” exception to the Pennsylvania Rights of Publicity statute, 42 Pa. Const. Stat. § 8316. Accordingly, Plaintiffs will file and serve unredacted

versions of their Complaint and Declarations, and also consent to having their pleadings unsealed.

Dated: October 24, 2024

Respectfully submitted,

By: /s/ Matthew A. Bole
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Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

The undersigned counsel of record for the Plaintiffs hereby certifies that the Plaintiffs' Show Cause Response was served, by electronic mail, on the below counsel of record for the Defendant on October 24, 2024:

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/s/ Manotti L. Jenkins

Manotti L. Jenkins